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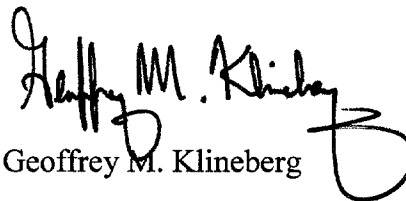(202) 326-7999

July 7, 2003

Ex Parte Presentation

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

> Re: *Application by SBC Communications Inc., et al. for Provision of In-Region, InterLATA Services in Michigan*, WC Docket No. 03-138

Dear Ms. Dortch:

On behalf of SBC Communications Inc. ("SBC"), and at the request of FCC Staff, I am attaching responses to questions raised by the Department of Justice relating to versioning and line splitting. In accordance with this Commission's Public Notice, DA 03-2039 (June 19, 2003), SBC is filing this letter electronically through the Commission's Electronic Comment Filing System. Thank you for your kind assistance in this matter.

Sincerely,

Geoffrey M. Klineberg

Attachment

cc: Gina Spade
Susan Pié
Rodney Gregg
Layla Seirafi-Najar
Qualex International

ATTACHMENT

I.   Questions Related to "Versioning" and the Development of an LSR-Based Agency Arrangement

        As discussed in the Cottrell/Lawson Joint Supplemental Affidavit,[1] at the April 3, 2003 CMP meeting, SBC suggested that partnering arrangements for data service (the line-splitting versioning issue raised by AT&T in this proceeding) could most effectively be addressed through a local service request ("LSR")-based agency arrangement, whereby the LSR would be modified in a manner that would allow a third party to submit orders on behalf of a CLEC using a different LSOR version than that used by the CLEC.[2]

        During the meeting, SBC and the CLECs[3] reviewed and discussed a document entitled "SBC Versioning – Pre-Order and Ordering OSS Interface Talking Points."[4] As specified in that document, an LSR-based agency arrangement would utilize the OBF-defined Local Service Provider Authorization (LSPAUTH) field and the Company Code (CC) field on the LSR to denote which entity is placing the order and which entity is the account owner. The LSPAUTH field would contain the Company Code (CC) for the existing owner of the account. The Company Code (CC) field on the LSR would be populated with the Company Code of the entity originating the LSR. The LSPAUTH would be validated against SBC's records to ensure the value matched the CC on the current account. The billing would continue to be under the CC contained in the LSPAUTH field. Confirmations, Completions, Provider-Initiated Responses ("PIRs") and Post to Bills would be returned to the originator of the request, or the OCN in the CC field.

        As described above, implementation of the LSPAUTH field would directly address AT&T's concern by allowing Covad to submit orders on behalf of AT&T using an LSOR version not used by AT&T. Specifically, in sending such an LSR, Covad would populate the LSPAUTH field with AT&T's CC – indicating to SBC's systems that AT&T is the owner of the account. Covad would populate the CC field with its own CC, indicating that it is both the entity originating the LSR and the entity to which all LSR notifications should be sent. Most importantly, as discussed during the April 3 meeting, this proposal could be implemented without any changes to SBC's versioning model In response to questions regarding how long

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[1] See Cottrell/Lawson Joint Supp. Aff. ¶ 41 (Supp. App. A, Tab 3).

[2] See Ex Parte Letter from Geoffrey M. Klineberg, Kellogg, Huber, Hansen, Todd & Evans, P.L.L.C., to Marlene H. Dortch, FCC, WC Docket No. 03-16, Attach. A, at 13-14 (Mar. 17, 2003): "SBC supports three versions of its interface software at all times in all of its regions, including two LSOG versions, for the express purpose of providing CLECs ample time to implement the changes required to move from one version to the next. The programming that supports this versioning scheme is based on the fundamental assumption that a given CLEC will operate on one – and only one – version of interface software at a time. Transactions from that CLEC are identified by the CLEC's OCN, and the system is programmed such that any transaction received with that OCN is processed on the correct LSOR version." (emphasis added).

[3] A list of CLEC and SBC representatives who attended the meeting is attached to the CMP Meeting Minutes. See Cottrell/Lawson Joint Supp. Aff., Attach. B, at 6-8.

[4] See Cottrell/Lawson Joint Supp. Aff., Attach. B, at 10-13.

this proposal would take to implement, SBC responded that it did not know because it did not have the level of detail required to make that determination, but that the "earliest date for consideration would be the first quarter of 2004."[5] Based on this discussion, all CLECs attending the meeting (including AT&T and WorldCom) agreed that the issue of third-party ordering should be addressed "outside of the versioning arena."

At the May 8, 2003 CMP meeting, it was agreed that a separate meeting would be held to specifically discuss the data services/line splitting and other partnership agency scenarios. That conference call was held on May 29.[6] On July 3, 2003, SBC posted business rules to the CLEC Online for implementation of the proposed LSR Agency process for line splitting. See Exhibit (attached to these responses). This document will be discussed with the CLECs at the CMP meeting scheduled for July 10.

Barring any unforeseen events, SBC is committed to implementing the LSR Agency process for line splitting as outlined in Attachment A, in the quarterly release currently scheduled for March 13, 2004.

II. Questions Relating to Voice Service Outages in a UNE-P to Line Splitting Conversion

MCI has apparently alleged that an "appreciable number" of its customers lost dial tone when it attempted to convert them from UNE-P to line splitting arrangements in SBC's 13-state region. This is not accurate. As explained in detail below, SBC has performed approximately 460 UNE-P to line-splitting migrations on behalf of MCI, and SBC is aware of approximately 8 instances in which an end user customer has experienced downtime lasting more than a few minutes. Moreover, 6 out of those 8 instances are directly attributable to an error made by an MCI representative in submitting an LSR.

As background, "UNE-P to line splitting" is the process whereby a CLEC submits an LSR to establish a line splitting arrangement using a stand-alone switch port and a stand-alone xDSL capable loop. SBC has a process, available in all 13 of its states, whereby a CLEC can submit a single LSR to accomplish this migration.[7] Under this single LSR process, the CLEC

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[5] In order to comply with all Change Management requirements, all release requirements for the quarterly release scheduled for March 13, 2004 must be completed by the end of July 2003, with final business requirements and a prioritized list of enhancements forwarded to SBC's Information Technology ("IT") organization by the middle of August. Systems design work to implement the release will be conducted by IT until the end of September. Based on that work, initial requirements will be distributed to the CLECs no later than October 13, 2003, with final requirements due no later than November 24, 2003. See Cottrell Aff., Attach. N, § 3.3 & App. G (App. A, Tab 6) (SBC 13-State Change Management Process). Internal code development will continue until the end of December, at which time internal testing will begin. The code then will be released for CLEC testing in early February, at least 37 days prior to implementation. Id. § 3.3.7 & App. G.

[6] See Accessible Letter CLECALL03-060 (May 20, 2003) (Supp. App. I, Tab 5).

[7] SBC rolled out its single LSR process for converting UNE-P to line splitting in October 2001 in the Southwest Region, in August 2002 in the SBC Midwest and SBC West Regions, and in December 2002 in the SNET region.

must place the correct voice carrier facility assignment (CFA) on the LSR, which tells SBC the location at which the CLEC wants the switch port connected to the collocation arrangement. The CLEC also must place the correct CFA for the xDSL-capable loop on the LSR, which tells SBC the location at which the CLEC wants the loop connected to the collocation arrangement.[8] The internal work orders necessary to accomplish this conversion are coordinated and assigned to one SBC technician, who works them together in order to minimize end user downtime. The SBC technician disassembles the UNE-P arrangement, and then connects the stand-alone switch port to the voice CFA designated on the LSR, and the stand-alone xDSL capable loop to the loop CFA designated on the LSR. If the CLEC correctly designates the CFAs, and the CLEC has correctly pre-wired its splitter and digital subscriber line access multiplexer (DSLAM) within its collocation arrangement, the end-user will have voice connectivity (and possibly data connectivity as well) as soon as these connections are made. There should be only a slight disruption of voice service while the SBC technician disconnects the loop and switch port on SBC's main distribution frame, and relocates them to the CFAs designated by the CLEC.

SBC began coordinated testing of the single LSR process with MCI on April 10, 2003. During the week of May 15, 2003, MCI submitted "friendly user" orders for UNE-P to line splitting migrations. During the last week of May 2003, MCI began submitting commercial orders for UNE-P to line splitting migrations. MCI has submitted approximately 460 orders to SBC in its 13-state region, of which approximately 250 have been commercial orders in the SBC Midwest region. Out of the 460 orders, SBC is aware of approximately 8 instances in which the customer experienced significant disruption of his or her voice service.[9]

SBC has performed a root cause analysis of these 8 instances, and its investigation has determined that, in all but two instances, the outage occurred because an MCI representative either (1) reversed the voice and loop CFAs when he or she populated them on the LSR or (2) entered a CFA on the LSR that was already occupied. SBC does not have any means of verifying the accuracy of the CFA assignments provided on the LSR by the CLEC, since these assignments are associated with the CLEC's own equipment. As a result, when the SBC technicians made the wiring connections based on the CFA information provided by MCI, the customer was left without dial tone. In one of the instances where dial tone was lost, SBC had mislabeled the CFA block in the central office (which was in Aurora, Illinois). Updated service orders were issued to reflect the correct block and location, and SBC technicians corrected the problem. The customer in this instance lost voice service for approximately 1 day. Another instance was a result of Ohio Bell technicians doing the central office wiring work prior to the migration due date, as well as certain translations not being processed sequentially after Ohio Bell expedited the service order when informed of the problem by MCI (which was on the third day of dial tone outage). The customer in this instance lost voice service for a total of approximately 6 days.

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[8] SBC will attempt to reuse the existing loop if it is xDSL capable; the CLEC should perform loop qualification prior to submitting the LSR to determine if the loop is xDSL capable.

[9] To date, SBC has successfully processed approximately 5000 UNE-P to line splitting migrations in its 13-state region.

In each of the 8 instances in which the customer experienced loss of dial tone, SBC worked closely with MCI to correct the problem and to get the customer back in service as quickly as possible. Loss of dial tone for all 8 cases averaged 2 days. With respect to the 6 cases where the loss in dial tone resulted from MCI's mistakes, most of the downtime was attributable to the fact that MCI did not follow the correct process to report the trouble. For example, in some cases, MCI sent trouble reports using the disconnected UNE-P's circuit identification number, rather than the switch port to cage or XDSL circuit identification number. In any event, SBC and MCI representatives have had a number of communications concerning the proper provisioning and maintenance processes, in order to minimize the possibility that there will be extended delays in resolving future troubles reported by MCI.

Further, in order to reduce the likelihood that similar problems will occur in the future, SBC has implemented a process to ensure that the customer will not lose dial tone for more than a short period of time. Specifically, after the SBC technician has connected the loop and switch port to their respective CFA assignments at the collocation arrangement as designated by the CLEC on the LSR, the technician will test to see that there is dial tone not only at the port CFA, but also at the loop CFA. If the SBC technician cannot verify dial tone at the loop CFA, the SBC technician will immediately reestablish the UNE-P service. The SBC technician will then contact the Local Operations Center, which will send an "A84" jeopardy notice to the CLEC, thereby informing the CLEC that the request to migrate from UNE-P to line splitting is in jeopardy. The SBC technician will re-establish the original UNE-P arrangement in order to restore the customer's voice service. Until the jeopardy is resolved, the customer will continue to be served via the UNE-P. The CLEC will then need to resolve the issue and supplement/correct the migration LSR order. A new due date will then be established for the conversion.

III.   Questions Related to "Reuse" of the xDSL Capable Loop in a Line-Splitting to UNE-P Conversion

In its initial Michigan 271 application, SBC explained Michigan Bell's policy and practice concerning the type of loop it provisions when it receives a request to convert a stand alone switch port used in line splitting to a UNE-P arrangement. As SBC has explained, when a CLEC has (or partnering CLECs have) established a line splitting arrangement, SBC provisions a stand-alone xDSL-capable loop and may also provision a stand-alone switch port to the CLEC's collocation space or that of its data CLEC partner. In the event that the DSL service is terminated, the CLEC has the capability to convert its customer back to a UNE-P arrangement. Under this process, the voice CLEC may submit a single LSR to Michigan Bell for conversion of the existing unbundled switch port to a new UNE-P arrangement. When Michigan Bell receives such an LSR, it establishes a new UNE-P arrangement by utilizing a loop that meets Michigan Bell service quality standards for a voice-grade loop, disconnecting the switch port from the collocation arrangement, and then combining the new voice grade loop and switch port at the main distribution frame. The customer keeps his or her telephone number in this conversion.

The question has been raised concerning why Michigan Bell provisions a new voice grade loop to establish the new UNE-P arrangement rather than automatically reusing the

existing stand-alone xDSL-capable loop. One reason, as SBC has explained, is that Michigan Bell has no assurance that the xDSL-capable loop meets Michigan Bell service quality standards for a voice-grade loop; that is, the loop may have been subjected to CLEC-requested loop conditioning to such a degree that voice service would be significantly degraded if the xDSL-capable loop were used for the new UNE-P arrangement.[10] In this regard, AT&T has asserted that any conditioning on the xDSL loop will have been performed by Michigan Bell (albeit at the request of the CLEC that ordered the xDSL loop), and therefore Michigan Bell "will know whether such conditioning is inconsistent with re-use of the loop for voice service."[11] This assertion, however, ignores how Michigan Bell's systems select and assign a loop facility to provision UNE-P service or, for that matter, Michigan Bell retail voice service. Michigan Bell's systems typically contain a variety of information concerning a given loop's physical characteristics, including information such as loop length, gauge, and information regarding any presence of load coils or repeaters. These systems, however, do not maintain historical information regarding the type of service arrangements for which a given loop facility has been used. Thus, Michigan Bell's systems do not know whether or not a given stand-alone xDSL-capable loop was previously used to provision UNE-P, Michigan Bell retail voice service, or some other service arrangement. Accordingly, although there is a possibility that Michigan Bell's systems could assign the xDSL-capable loop used in a line splitting arrangement as the loop facility to be used in a new UNE-P arrangement, Michigan Bell cannot guarantee this will be the case.

Moreover, unless Michigan Bell has received and processed an LSR from the customer of record for the xDSL-capable loop at issue (typically the CLEC that ordered it) requesting that such loop be disconnected, the loop will not be in Michigan Bell's inventory of loops available for assignment to the address in question, when the new UNE-P arrangement is established. Michigan Bell has no legal right to arbitrarily take the xDSL-capable loop from the CLEC customer of record for that loop, and place it out of service, in order to provision some other service arrangement, whether that arrangement is a new UNE-P, Michigan Bell retail voice service, or some other service arrangement. [12] Indeed, the mere fact that the voice CLEC in a line-splitting arrangement wishes to convert its customer to a new UNE-P arrangement does not necessarily mean that the CLEC customer of record for the xDSL-capable loop no longer wants, and releases its rights to, that loop.

Again, however, this does not mean that the stand-alone xDSL capable loop in a line splitting arrangement *cannot* be reused as the loop facility for the new voice grade loop in the new UNE-P arrangement. In fact, it is possible for Michigan Bell to use such a loop facility for the new voice grade loop in the UNE-P arrangement. However, that would occur only if the following were true. First, the xDSL-capable loop would have to have been returned to

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[10] Michigan Bell is required by both its interconnection agreements, and state commission prescribed service quality standards, to provision voice grade service that meets certain specific engineering requirements.

[11] Ex Parte Letter from Alan C. Geolot to Marlene H. Dortch, WC Docket No. 01-16, at 6 (Mar. 28, 2003).

[12] It is important to recognize that there is no difference between a new UNE-P arrangement and Michigan Bell retail voice service. Both consist of a loop, switch port, and transport provisioned as a combination of network elements.

Michigan Bell's inventory as a loop available for assignment to the address in question. (Again, this could occur only if Michigan Bell had received and processed a disconnect order for the stand-alone xDSL-capable loop from the CLEC customer of record for that loop.) Second, Michigan Bell's Loop Facility Assignment and Control System (LFACS) would have to select the loop, from its inventory of loops available for assignment to the address in question,[13] as the voice-grade loop to be provisioned as part of the new UNE-P arrangement, based on LFACS's loop selection and assignment process. LFACS uses the same loop selection and assignment process for a UNE-P service that it uses for a Michigan Bell retail voice service. In other words, regardless of whether the CLEC is requesting that the customer be converted to UNE-P or Michigan Bell is winning the customer back to its retail voice service, LFACS utilizes the same loop selection and assignment process in selecting the loop to be utilized in provisioning the service.

MCI recently submitted a request to the CLEC User Forum (CUF) to develop a single order process that would allow a CLEC that is currently providing voice and data service to an end user using a stand-alone unbundled switch port and a stand-alone xDSL-capable loop to (1) convert that end user's voice service to UNE-P and (2) reuse the existing stand-alone xDSL-capable loop facility in establishing the new UNE-P. In response to this request, SBC has agreed to consider, and is currently considering, the feasibility of developing such a single-order process (or, if that is not feasible, a related-order process) where the same CLEC is the customer of record for both the stand-alone xDSL loop and the stand-alone unbundled switch port. In determining the feasibility of accommodating this request, a number of factors will need to be considered, including cost recovery, operational limitations, systems modification and development work, anticipated order volumes, and the potential impact to SBC's performance measures. SBC will also consider other alternatives to meet the CLECs' needs. More collaboration and testing will be required to address these issues, and SBC will continue to work with CLECs to find mutually acceptable solutions to them.[14]

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[13] Because, in this arrangement, the xDSL-capable loops are a "designed" circuits, therefore, when the xDSL-capable loop is disconnected, Michigan Bell's systems automatically utilizes an extended due date process for designed circuits. This process requires an extended five day due date for the loop. This extended due date process, which applies to design circuits regardless of whether they were provisioned on a wholesale or retail basis, would have to be manually overridden to return an xDSL-capable loop to the inventory of loops that are available for assignment.

[14] Because of the potential to reduce technician dispatch, such a process, if proven feasible, efficient, and cost-effective, could also be beneficial to SBC.

EXHIBIT

13 State LSR Agency Process

BACKGROUND:

SBC is proposing a new LSR process in all versions allowing a CLEC to act as an agent for another CLEC, thus enabling them to issue requests on their behalf. This is to address the current versioning issue for CLEC partnerships using the line splitting process. SBC will implement the OBF-defined Local Service Provider Authorization (LSP AUTH) field to accommodate the new process. This field will contain the company code for the existing owner of the account. The Company Code (CC) field would be populated with the company code of the CLEC or agent originating the LSR. Both values will be validated accordingly if populated.

Responses to the CLEC will be impacted. Confirmation, Jeopardy, PIA, Completion and Post to Bill responses will be sent to the company originating the LSR, the value in the CC field. Loss Notifications are not impacted as ACT V and W are out of scope.

In Scope

REQTYP	ACT
A	N, C, D, T
E	N, C, D, T, S, B, Y
F	N, C, D, T, S, B
M	N, C, D, T, S, B
K	N, C, D, T
P	C, D, T, S, B
R	N, C, D, T
S	N, C, D, T
T	N, C, D, T, S, B
U	N, C, D, T
V	C, D, T
W	N, C, D, T
X	C, D, T
Y	N, C, D, T
Z	N ,C, D, T
2	N, C, D, T
3	N, C, D, T

Out of Scope:

REQTYP	ACT
J	N, D, R
A	V
B	V
C	V
E	R, V, W
F	R, V
K	V, W
M	R, V
P	R, V, W
R	R, V, W
S	R, V
T	R, V, W
U	R, V
V	R, V
W	R, V
X	R, V
Y	R, V
Z	R, V, W
2	R, V
3	R, V

Exhibit - 1

LSP AUTH BUSINESS RULES:

LSP AUTH - Local Service Provider Authorization
Indicates the company code of the local service provider that is providing existing service and has authorized the change to a new service provider or authorized another service provider to submit the request.

NOTE 1: A four alpha / numeric character code structure available for CLECs in North America maintained by NECA also known as OCN

NOTE 2: The LSR LSP AUTH entry represents the company code of the CLEC who has given permission to the agent to submit LSR requests on his behalf.

USAGE: This field is conditional.

ACTIVITIES

		N	C	D	T	R	V	W	S	B	Y
REQTYP	A	C	C	C	C		P				
	B						P				
	C						P				
	E	C	C	C	C	P	P	P	C	C	C
	F	C	C	C	C	P	P		C	C	
	J	P		P		P					
	K	C	C	C	C		P	P			
	M	C	C	C	C	P	P		C	C	
	P		C	C	C	P	P	P	C	C	
	R	C	C	C	C	P	P	P			
	S	C	C	C	C	P	P				
	T	C	C	C	C	P	P	P	C	C	
	U	C	C	C	C	P	P				
	V		C	C	C	P	P				
	W	C	C	C	C	P	P				
	X		C	C	C	P	P				
	Y	C	C	C	C	P	P				
	Z	C	C	C	C	P	P				
	2	C	C	C	C	P	P				
	3	C	C	C	C	P	P				

CONDITIONS:
1. REQTYP, SC and LSP AUTH must be a valid combination per the CLEC profile.

2.   When the REQTYP is A and ACT is C, D or T; or the REQTYP is F or M and ACT is C, D, S, B, or T; the LSP AUTH value must be the same as the CC for the ECCKT or TNS on the existing records if populated.

3.   When REQTYP is A, ACT is C, LNA is C, SLTN and OECCKT fields are populated, LSP AUTH must be the same as CC value for the SLTN on the existing records if populated.

Exhibit - 2

4. When the REQTYP is E and the ACT is C, D, S, B, Y or T; the LSP AUTH value must be the same as the CC for the ATN on the existing records if populated.

5. When ACT is N and 2nd position of TOS is P, LSP AUTH must match SLTN account company code on record if populated.

6. LSP AUTH must be a valid CC.

Data Characteristics: 4 alpha / numeric characters

CC BUSINESS RULES:

Change From: When REQTYP is A, ACT is C, LNA is C, SLTN and OECCKT fields are populated, CC must be the same as CC value for the SLTN on the existing records.

Change To: When REQTYP is A, ACT is C, LNA is C, LSP AUTH is not populated, SLTN and OECCKT fields are populated, CC must be the same as CC value for the SLTN on the existing records

Change From: When the REQTYP is A and ACT is C, D or T; or the REQTYP is F or M and ACT is C, D, S, B or T; the CC value on the existing records must be the same as the CC on this LSR for the ECCKT or TNS on the existing records.

Change To: When the REQTYP is A and ACT is C, D or T; or the REQTYP is F or M and ACT is C, D, S, B or T: and LSP AUTH is not populated, the CC value on the existing records must be the same as the CC on this LSR for the ECCKT or TNS on the existing records.

Change From: When the REQTYP is E and the ACT is C, D, S, B, Y, T or R, the C must be the same as the CC value for the ATN on the existing records.

Change To: When the REQTYP is E and the ACT is C, D, S, B, Y, T or R, and the LSP AUTH field is not populated, the CC must be the same as the CC value for the ATN on the existing records.

New: When ACT is N, 2nd position of TOS is P, and LSP AUTH is not populated, CC must match SLTN account company code on record if populated.

BAN1 BUSINESS RULES:

Change From: When REQTYP is A, B, F or M and the BAN1 field is populated, the BAN must be compatible with the CC, LATA and REQTYP

Change To: When REQTYP is A, B, F or M, ACT is V and the BAN1 field is populated, the BAN must be compatible with the CC, LATA and REQTYP

New: When REQTYP is A, F or M, ACT is N, C, T, D, S or B and the BAN1 field is populated, the BAN must be compatible with the CC/LSP AUTH (when populated), LATA and REQTYP

Exhibit - 3

New: When REQTYP A, F, M or E, ACT is N, C, D, T, S or B and the BAN1 is populate, the BAN number must be a valid working account for the CC/LSP AUTH (when populated)) issuing the LSR request

RESALE TN BUSINESS RULES:

Change From: When LNA is N or LNA is C or T and the OTN is populated, the entry in this field cannot equal a telephone number that has been reserved by a CC other than the CC on the request

Change To: When LNA is N or LNA is C or T and the OTN is populated, the entry in this field cannot equal a telephone number that has been reserved by a CC other than the CC/LSP AUTH (when populated) on the request

PORT TN BUSINESS RULES:

Change From: When LNA is N or LNA is C or T and the OTN is populated, the entry in this field cannot equal a telephone number that has been reserved by a CC other than the CC on the request

Change To: When LNA is N or LNA is C or T and the OTN is populated, the entry in this field cannot equal a telephone number that has been reserved by a CC other than the CC/LSP AUTH (when populated) on the request

BAN2 BUSINESS RULES:

Change From: When SC is CA or NV, REQTYP is A, 2nd position of TOS is P and BAN2 is populated, the BAN number must be a valid working PORT BAN for the company code issuing the LSR and must be valid for the LATA

Change To: When SC is CA or NV, REQTYP is A, 2nd position of TOS is P and BAN2 is populated, the BAN number must be a valid working PORT BAN for CC/LSP AUTH (if populated) issuing the LSR and must be valid for the LATA

Change From: When SC is IL, IN, MI, OH, WI, AR, KS, MO, OK or TX, REQTYP is A, 2nd position of TOS is P and BAN2 is populated, the BAN number must be a valid working PORT or LOOP with PORT BAN for the company code issuing the LSR and must be valid for the LATA.

Change To: When SC is IL, IN, MI, OH, WI, AR, KS, MO, OK or TX, REQTYP is A, 2nd position of TOS is P and BAN2 is populated, the BAN number must be a valid working PORT or LOOP with PORT BAN for the CC/LSP AUTH (if populated) issuing the LSR and must be valid for the LATA

Change From: When SC is CT, REQTYP is A, 2nd position of TOS is P and BAN2 is populated, the BAN number must be a valid working PORT BAN for the company code issuing the LSR

Change To: When SC is CT, REQTYP is A, 2nd position of TOS is P and BAN2 is populated, the BAN number must be a valid working PORT BAN for the CC/LSP AUTH (if populated) issuing the LSR

Exhibit - 4

Change From: When BAN2 is populated, the BAN must be compatible with the CC, LATA and REQTYP.

Change To: When BAN2 is populated, the BAN must be compatible with the CC/LSP AUTH (when populated), LATA and REQTYP.

Change From: When SC is CT, REQTYP is F, M, U or 3 and BAN2 is populated, the BAN must be a valid working account for the company code issuing the LSR.

Change To: When SC is CT, REQTYP is F, M, U or 3 and BAN2 is populated, the BAN must be a valid working account for the CC/LSP AUTH (if populated*)* issuing the LSR.
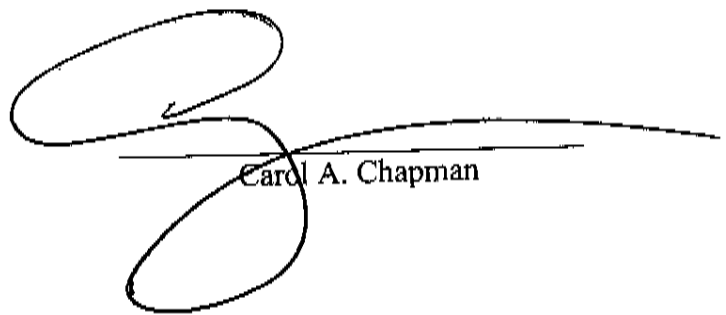
Exhibit - 5

I hereby declare, under penalty of perjury, that Part I of the foregoing attachment is true and correct.

Executed on July 7ᵀᴴ, 2003.

Beth Lawson

Beth Lawson

I hereby declare, under penalty of perjury, that Parts II and III of the foregoing attachment are true and correct.

Executed on July 7 , 2003.

Carol A. Chapman